

**UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
MARSHALL DIVISION**

PAY AS YOU GO, LLC,

Plaintiff,

v.

VERIZON COMMUNICATIONS INC.

Defendants.

Civil Action No.: 2:23-cv-463-JRG

**UNOPPOSED MOTION FOR AN EXTENSION OF TIME TO ANSWER OR
OTHERWISE RESPOND TO THE COMPLAINT**

Verizon Communications Inc. (“VCI”) respectfully moves for a one-week extension of time to December 29, 2023, to answer or otherwise respond to plaintiff Pay As You Go, LLC (“PAYG”) Complaint. Plaintiff PAYG does not oppose this extension. Good cause exists for a one-week extension to allow VCI to continue to evaluate PAYG’s allegations and to formulate its response. Moreover, the above captioned case has been consolidated for pre-trial purposes with the case captioned *Pay As You Go, LLC v. T-Mobile USA, Inc.*, Case No. 2:23-cv-501-JRG into the lead case captioned *Pay As You Go, LLC v. AT&T Inc.*, Case No. 2:23-cv-462-JRG. Because T-Mobile’s Answer is due on January 6, 2024, a one-week extension of the deadline in this case to December 29, 2023, will not delay the progress of the consolidated cases.

Dated this 22nd day of December, 2023

Respectfully submitted,

By: /s/ Ross R. Barton

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Counsel for Verizon Communications Inc.

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing document was filed electronically in compliance with Local Rule CV-5(a). Therefore, this document was served on all counsel on December 22, 2023.

/s/ Deron R. Dacus
Deron R. Dacus

CERTIFICATE OF CONFERENCE

The undersigned certifies that Verizon's counsel has complied with the meet and confer requirement in Local Rule CV-7(h) and that the foregoing motion is unopposed. The parties met and conferred on December 22, 2023 via email. Counsel for Plaintiff stated that it does not oppose this motion.

/s/ Deron Dacus
Deron Dacus